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March 17, 2020

Honorable Pamela Pepper  
US. District Judge  
517 E. Wisconsin Avenue  
Milwaukee, WI 53202

Re: *United States v. Yousef Barasneh*  
Case No. 20-CR-26

Dear Judge Pepper:

Back on February 21, 2020, I filed a motion to adjourn the trial in this case. Doc. 13. On February 24, the Court granted that motion in a text only-order and required the parties to file a status report by the end of the day on April 17, 2020, notifying the Court of their anticipated next steps. At the same time, I filed a motion, which Magistrate Judge Joseph granted, to extend the time for Barasneh to file pretrial motions until March 11. Doc. 14. On March 11, I again asked Judge Joseph to extend the deadline to file motions until March 18, 2020. Doc 18. The government did not oppose that request, and the Court granted it.

When I drafted the March 11 motion for more time, I believed I could accomplish by tomorrow what I intended to get done. I know now that I can't. I have had very little time to do anything on Mr. Barasneh's case since March 11. I was away this weekend visiting my in-laws in rural northern Wisconsin, and Federal Defender Services has been scrambling to prepare for "tele-working" from home, which we start tomorrow.

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In light of all of our responses to the coronavirus and its impact on the pace of things and the ability to get work done, I ask the Court for the following relief:

to modify the date by which the Court wants a status report from the parties on their anticipated next steps from April 17 to May 8, 2020, so that I may ask Magistrate Judge Joseph for an additional two weeks to contemplate filing any pretrial motions in this case.

Earlier today, I communicated with Assistant United States Attorney Ben Proctor who told me that the government does not oppose this request.

Yousef Barasneh understands that, should the Court grant this request, the Court would exclude the time from April 17, 2020 to May 8, 2020 from the Speedy Trial calculation under 18 U.S.C. § 3161(7)(A) and (B)(iv)

Sincerely,

s/ John W. Champion  
John W. Champion

JWC/jmb